

LAW OFFICES OF SIMON HARTER, ESQ.  
225 West 34<sup>th</sup> Street – 9<sup>th</sup> Floor  
New York, New York 10122  
Tel: (212) 979-0250  
Fax: (212) 979-0251  
Email: [sharter@harterlaw.com](mailto:sharter@harterlaw.com)  
Attorneys for Plaintiff,  
CADDELL DRY DOCK AND REPAIR CO., INC.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
CADDELL DRY DOCK AND REPAIR CO, INC., :  
 :  
Plaintiff, : **CASE NO.: 1:20-cv-00685 (EK-LB)**  
 :  
- against - :  
 :  
BOUCHARD TRANSPORTATION CO., INC., :  
*in personam*, BARGE B. NO. 280, *in rem*, and :  
B. NO. 280 CORP., *in personam*, :  
 :  
Defendants. :  
-----X

**RULE 26(f) MEETING REPORT**

Have the parties met and conferred? **Yes** Date? **April 15, 2020**

Date the Rule 26(a)(1) initial disclosures were exchanged? **April 15, 2020**

**Proposed Discovery Plan**

1. Deadline for parties to provide properly executed authorizations/releases:  
**N/A**
2. Deadline to join new parties or amend the pleadings: **July 15, 2020**
3. Should any changes be made in the limitations on discovery imposed under the Federal Rules of Civil Procedure or by local rule? Yes \_ No **X**
4. Deadline to file any protective order: **July 15, 2020**

5. The parties shall complete all fact discovery by: **August 1, 2020**
6. The parties shall complete expert discovery, if necessary, by: **Sept. 15, 2020**
7. The parties shall file any pre-motion conference request by: **Sept. 1, 2020, or as otherwise warranted**
8. Should the Court hold an early settlement conference in this action?  
Yes **X** No
9. Have the parties agreed to a plan regarding electronic discovery?  
Yes    No **X**
10. Do the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. §636? (Answer no if any party declines to consent without indicating which party has declined) Yes No **X**

Dated: April 15, 2020

Respectfully submitted,

**LAW OFFICES OF SIMON HARTER, ESQ.**  
Attorneys for Plaintiff, CADDELL DRY  
DOCK AND REPAIR CO., INC.

**FREEHILL, HOGAN & MAHAR, LLP**  
Attorneys for Defendants, BOUCHARD  
TRANSPORTATION CO., INC.; BARGE  
B. NO. 280; and B. NO. 280 CORP.

By: /s/ Simon Harter  
Simon Harter, Esq.  
225 West 34<sup>th</sup> Street – 9<sup>th</sup> Floor  
New York, New York 10122  
Tel: (212) 979-0250  
Fax: (212) 979-0251  
Email: [sharter@harterlaw.com](mailto:sharter@harterlaw.com)

By: /s/ John J. Walsh  
John J. Walsh, Esq.  
80 Pine Street – 25<sup>th</sup> Floor  
New York, New York 10005  
Tel: (212) 425-1900  
Fax: (212) 425-1901  
Email: [Walsh@freehill.com](mailto:Walsh@freehill.com)